IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Janisia Lanice Kimbrough, Debtor Case No. 25-00982-JAW
CHAPTER 13

MOTION TO EXTEND AUTOMATIC STAY

COMES NOW Debtor by and through their undersigned attorney, pursuant to 11 U.S.C. §362(c)(3)(B), and respectfully move this court to continue the automatic stay provided under 11 U.S.C. §362(a) as to all creditors, and in support thereof would show:

- 1. That this Court has jurisdiction over this matter pursuant to 11 U.S.C. §105(a), 28 U.S.C. §157(b)(1), and 28 U.S.C. §1334. This matter constitutes a core proceeding as defined by 28 U.S.C. §157(b)(2).
- 2. That on 04/15/2025, Debtor filed the petition for relief under Chapter 13 in the instant cause.
- 3. That on or about 11/9/2022, Debtor filed a Chapter 13 proceeding, case number 22-02339, and said case dismissed on 3/3/2025.
- 4. That debtor filed the instant case in good faith and only after a substantial change in the financial and personal affairs of the Debtor.
- 5. That this motion is not made for the purposes of delay, but in good faith.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully requests the Court continue the stay under 11 U.S.C. §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief from stay is granted under §362(d). Debtors further requests any additional relief, general or specific, to which they may be entitled.

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel: Thomas C. Rollins, Jr. The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and
foregoing Motion to Extend Automatic Stay and Declaration were forwarded on April 16, 2025,
to:

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI
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6	IN RE: CASE NO: 25-00982-JAW JANISIA LANICE KIMBROUGH DECLARATION OF MAILING
7	CERTIFICATE OF SERVICE
8	Chapter: 13
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11	On 4/16/2025, I did cause a copy of the following documents, described below,
12	Motion to Extend Declaration in Support
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18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
19	
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
21	Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
23	served electronically with the documents described herein per the ECF/PACER system. DATED: 4/16/2025
24	<u>/s/ Thomas C. Rollins, Jr.</u> Thomas C. Rollins, Jr. 103469
25	The Rollins Law Firm
26	702 W. Pine Street Hattiesburg, MS 39401
27	601 500 5533 trollins@therollinsfirm.com
28	

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4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI
5	IN RE: CASE NO: 25-00982-JAW
6	JANISIA LANICE KIMBROUGH CERTIFICATE OF SERVICE
7	DECLARATION OF MAILING Chapter: 13
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11	On 4/16/2025, a copy of the following documents, described below,
12	Motion to Extend Declaration in Support
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19	were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
21	referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.
22 23	DATED: 4/16/2025
24	
25	Will hall
26	Miles Wood BK Attorney Services, LLC
27	d/b/a certificateofservice.com, for Thomas C. Rollins, Jr.
28	The Rollins Law Firm 702 W. Pine Street
	Hattiesburg, MS 39401

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LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 25-00982-JAW SOUTHERN DISTRICT OF MISSISSIPPI WED APR 16 9-23-8 PST 2025

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ADVANCE AMERICA 4237B LAKELAND DR FLOWOOD MS 39232-9212

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PO BOX 12055 ROANOKE VA 24022-2055

ALLSTATE

CANADA

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BMG MONEY 1221 BRICKELL AVE MIAMI FL 33131-3224 BLUEFROG 1855 BOWLES AVE FLOVILLA GA 30216 CASHCENTRALCOM 84 EAST 2400 NORTH LOGAN UT 84341-2902

(P) CONTINENTAL FINANCE COMPANY PO BOX 3220 BUFFALO NY 14240-3220

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PO BOX 607 NORWOOD MA 02062-0607

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CREDIT COLLECTION SERC 725 CANTON ST NORWOOD MA 02062-2679

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GENESIS FS CARD SERVICES PO BOX 4499 BEAVERTON OR 97076-4499 GLOBAL LENDING 5 CONCOURSE PKWY ATLANTA GA 30328-7104 HOPE FEDERAL CREDIT UNION JACKSON MED MALL JACKSON MS 39213

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MILESTONE
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BEAVERTON OR 97076-4499

(P)MISSION LANE LLC PO BOX 105286 ATLANTA GA 30348-5286 NAVIENT PO BOX 9500 WILKES BARRE PA 18773-9500

NELNET PO BOX 82561 LINCOLN NE 68501-2561 (P)POSSIBLE FINANCIAL INC PO BOX 98686 LAS VEGAS NV 89193-8686 PREMIER BANKCARD PO BOX 2208 VACAVILLE CA 95696-8208

PROGRESSIVE LEASING 256 W DATA DR DRAPER UT 84020-2315

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